



Office of the Town Manager
16 Lowell Street
Reading, MA 01867

781-942-9043
townmanager@ci.reading.ma.us
www.readingma.gov/town-manager

To: Clark Ziegler, Executive Director
Massachusetts Housing Partnership
160 Federal Street
Boston, MA 02110

From: Robert W. LeLacheur, Jr. CFA

Date: August 18, 2016

RE: Review Comments – Schoolhouse Commons (proposed 40B project)
172 Woburn Street, Reading MA

Dear Mr. Ziegler,

The following constitutes the Town of Reading's comments on Reading Equitable Housing, LLC's August 3, 2016 application to MHP for a Project Eligibility Letter (PEL) for the above named property. I understand that if MHP issues a PEL, the next step would be for the applicant to apply to the Reading Zoning Board of Appeals (ZBA) for a Comprehensive Permit under MGL Chapter 40B.

Background

The subject property was previously part of the lot that includes St. Agnes Catholic Church located at 186 Woburn Street in Reading. Recently 186 Woburn Street was granted an Approval Not Required (ANR) to subdivide the property into two lots. This created the new lot at 172 Woburn Street. St. Agnes Church then applied to the ZBA for a Special Permit to use up to 32 parking spaces on the new lot (172 Woburn Street) for church-related use. The Special Permit was granted on November 5, 2015 allowing the church exclusive use in perpetuity of up to 32 parking spaces at 172 Woburn Street (the 40B site).

Previous attempts at developing 172 Woburn Street have led to neighborhood concerns about design, light spillage, drainage, density and school impacts. In 2013, the Town of Reading, through its School Department, secured an option to acquire the property for use as an early childhood education center. The School Department's plan could not resolve concerns over traffic circulation related to the drop off of small children and therefore did not move forward. In 2014 a local developer also expressed an interest in this property and applied to the Community Planning and Development Commission (CPDC) for approval to locate "off-site" affordable units required under zoning for an approved multifamily housing project known as Johnson Woods. The CPDC ultimately did not look favorably on the Johnson Woods "off-site affordable housing" proposal and the project never proceeded any further.

Town of Reading - Affordable Housing

The application notes that in 2013 the Town of Reading adopted a Housing Production Plan which was also approved by the State. The HPP provides a roadmap for the Town to follow to proactively plan for new housing. The housing production strategies are designed to encourage housing development, especially for special populations like low/moderate income households. The HPP link is: <http://www.readingma.gov/node/2427>.

Reading is recognized as a leader in municipal planning, and is frequently invited to speak to planning groups throughout the region on its accomplishments including planning for affordable housing. Reading has amended its' zoning bylaw to allow for both dense development and intergenerational living, both of which support affordable housing. Reading has a strong record of proactively planning for housing as further evidenced by:

- **DHCD showcases Reading on its website as a model 40R community** - Reading's two MGL Chapter 40R Smart Growth Overlay Zoning Districts that permit 458 new units "by right". The Gateway Smart Growth District (GSGD) is comprised of Reading Woods, a 424-unit housing development located on the Stoneham line. The GSGD is a portion of Reading Woods, and includes a total of 200 units with 20% (43 units) designated as affordable housing. In accordance with the Master Plan, the Downtown Smart Growth District (DSGD) was adopted in 2009 and was the foundation for "by right" residential or mixed-use in a walkable, vibrant downtown with a commuter rail station as its hub. The 26-acre DSGD allows an estimated 258 new residential units. To date, 53 residential units have been built and the CPDC anticipates another application for Site Plan Review shortly which will add another 50+ residential units. Also, the CPDC is studying expanding the DSGD and is planning on finalizing its recommendation to Town Meeting for an Article to be presented in 2017, which, if approved by Town Meeting will allow for added "by right" residential or mixed-use.
- **2015 Economic Development Action Plan (EDAP)** – working with the Metropolitan Area Planning Council (MAPC) Reading created an EDAP. The EDAP identifies economic development strategies including expanding the DSGD. The EDAP link is: <http://www.readingma.gov/planning-division/files/economic-development-action-plan-with-appendices>
- **2015 Metro North Regional Housing Office (MNRHSO)** – Reading established the MNRHSO comprised of the Towns of Reading, North Reading, Wilmington, and Saugus. The MNRHSO shares the expenses of a full-time housing coordinator who monitors existing affordable housing and provides expertise related to affordable housing. An Advisory Committee oversees the MNRHSO. Massachusetts has only a handful of RHSO's and Reading is proud to have developed this for the Metro North region.
- **2014 Comprehensive Update of the Reading Zoning Bylaw (ZBL)** – The updated ZBL clarified, simplified, and modernized zoning for ease of use by developers. Accessory Dwelling Units (ADU) are now allowed "by-right" (instead of through a special permit process administered by the ZBA) provided performance standards can be met and that the ADU is located in an existing structure. Permitting checklists have been developed to simplify zoning further.

- **Reading 2020 Board of Selectmen Strategic Plan** – A planning effort that will establish long term goals and strategic plans for the future. Planning for future housing needs is an element of this plan so that our policies and regulations support the needs of the community.

Schoolhouse Commons is one of the five 40B projects in Reading. The additional 4 pending 40B projects are described below in chronological order:

- Several years ago a comprehensive permit was issued for 45 Beacon Court. This project, approved for 10 units, has not been constructed.
- In the Spring of 2015, Lyle Estates applied to MassHousing for a PEL for 16 new units of townhouse style duplex housing on 2.75 acres which is still pending (although a 4 lot subdivision is also under review by the CPDC).
- In August of 2015 MassHousing issued a PEL for Reading Village, a 77-unit 5-story multi-family development on a site of approximately 35,000 square feet. A comprehensive permit was filed on February 4, 2016 which is under review by the ZBA. Through a series of extensions of time and project modifications the plans have been revised as a 72-unit 4-story multi-family project on roughly 42,000 square feet of land (an additional parcel is now included) on a corner across from the commuter rail station.
- In 2016 a local developer approached the Town of Reading with schematic plans for multi-family housing on a large site that could be one of the largest 40B projects to date. A late 2016/early 2017 40B application is anticipated.

Section II: Site and Project

- The site plan indicates that the land area is 45,779 s.f. and is long and narrow with the building in the front and a parking lot in the rear. Site circulation including access from the long narrow driveways on both sides of the building present some challenges that the Fire Department has identified but that appear to be addressed in the June 29, 2016 Site Plan. Sharing a stacked exit driveway with the church potentially posed additional design issues that appear to be addressed in the current plans as well.
- Proximity to Downtown – the site is located in a residential neighborhood that is a short walk to Downtown and the Commuter Rail Station. Reading is a suburban community with a vibrant Downtown. However, there is no grocery store in the Downtown making going car free a challenge.
- The floor plans, landscaping plan, and site plan included in this application generally describe the site layout, landscaping, unit mix and provision of off-street parking. The tabulation provided on Sheet A-1 shows that there are 20 units planned with 9 - 1 bedrooms, 9 - 2 bedrooms and 2 - 3 bedrooms. The tabulation does not include the number of bathrooms per unit. The plans do not include information describing the affordable units or where the affordable units are located.

- Additional information should be furnished including:
 - Indicate on plans unit distribution by size, bedrooms, and affordability;
 - Property Management - No documentation was provided regarding property management including how will trash and recycling be handled for the site;
 - Lighting – This was requested at the DRT; nothing has been provided;
 - Parking – Additional details are needed to understand how the easements regulating 31 of the 66 total off-street parking spaces will be managed for the exclusive use by St. Agnes Church. Property management details and copies of easements should be provided to clarify how this arrangement will be handled on a day-to-day basis to minimize potential conflicts.
 - Fencing/Retaining Wall – More details are needed to understand this interplay of fencing, grade changes, guardrails and other improvements. The plans show a 6 foot high wooden stockade fence along the Southern and Eastern property lines that screens the site from the residential abutters. The stockade fence on the Eastern property line may need to be adjusted to provide needed sight lines for safe egress. A new block style retaining wall will be constructed with a guard rail on top along the West (church) side of the property. At the site visit the project engineer indicated that the retaining wall is approximately 7 feet high at the highest point. The site plan should clearly depict this aspect of the project.
 - Landscaping - Existing Trees - There are large mature trees in the front and rear of the site that should be preserved. These trees should be clearly marked on the site and landscape plans.
 - Woburn Street Entrance/Stone Retaining Wall – The plans show that there is a ramp and walkway accessing the front entrance that leads to a crosswalk and handicapped sidewalk area. At the site visit there was a question related to the retaining wall designed along Woburn Street and whether it impedes access to the handicapped sidewalk leading to the crosswalk. This may require further study.

The Town has had a review of the schematic plans that were made available several months ago and held a Development Review Team (DRT) meeting back in January. The attached minutes of the DRT highlight the questions raised at that time. The updated plans address many of the DRT identified issues. The remaining issues that are not addressed by the updated plans include:

1. Snow Storage & Removal	Applicant would ideally store on grass, but may have to designate some parking spaces and/or contract with hauler	
2. Gas fired boiler	Will need to talk to gas company (National Grid) about possibility of extending high powered gas line from Summer Avenue	
3. Drainage	Issue at the rear of school lot has been mitigated, abutter would like it to remain that way with the new project	Email regarding call from abutter
4. Common Areas	The site and building do not provide common areas or open spaces for the residents to utilize	
5. Accessible Units	The Applicant has stated that 1 unit will be fully accessible and that all units will be adaptable. This is a priority for the Town.	

Section VI: Sustainable Development

- The development is in close proximity to the commuter rail station but isn't a true transit-oriented development as it isn't located in an area that residents can access all of their needs without a vehicle. Bike racks are not indicated on the plans but should be.
- The percentage of affordable units is incorrectly stated here as 25%; the plans, pro-forma, and other correspondence we have received indicate that there will be 20% affordable units (4 units).

The Town of Reading has been planning for and working diligently to achieve our 10% affordable housing goal for several years. We are generally supportive of redevelopment projects that take existing vacant buildings and put them to a productive use, provided the impact on the neighborhood is low. Thank you again for the opportunity to express our concerns. I am happy to answer any further questions.

Sincerely,

A handwritten signature in black ink, appearing to read "RW LeLacheur Jr.", written over the printed name and title.

Robert W. LeLacheur Jr.
Town Manager

Attachment (DRT Notes)

cc: Board of Selectmen
Zoning Board of Appeals
Community Planning and Development Commission
Assistant Town Manager
Community Development Director

Development Review Team Meeting

January 20, 2016
172-186 Woburn Street

Staff Present (see attached sign in sheet for contact info): Town Manager Robert LeLacheur, Assistant Town Manager Jean Delios, Fire Chief Greg Burns, Community Development Director Julie Mercier, Health Agent Steven DiLauro, Town Engineer George Zambouras, Safety Officer David Savio, Conservation Agent Chuck Tirone, Building Inspector Glen Redmond, DPW Director Jeff Zager, RMLD Engineer Peter Price, Applicant Mike Sullivan, Applicant's Engineer Jack Sullivan, Applicant's 40B Consultant Michael Jacobs, Applicant's Attorney Brad Latham, Applicant's Architect Sid Silveira

The Applicant is proposing a 20-unit rental 'friendly' 40B (5 units will be made eligible to income qualified renters earning at or below 80% Area Median Income) in the former St. Agnes school building at 172-186 Woburn Street. The building was recently separated from the church onto its own lot through the Approval Not Required (ANR) process. The Applicant has received a Special Permit from the ZBA to allow the church to utilize up to 32 of the parking spaces on the proposed apartment building lot during church services. Previous attempts at developing this property have led to neighborhood concerns about design, light spillage, drainage, density and school impacts. The neighborhood concerns, as well as the Special Permit Decision, are attached to this memo. The application, plans and supporting materials are provided under separate cover.

The Applicant has indicated that the duration of construction would be about a year.

The following is a list of comments from the DRT:

DRT Comments		
Planning		
	Comment	Policy/Regulation
1. Outreach	The Applicant is strongly advised to meet with the neighbors.	
2. Shared Parking/ Access	Easements and agreements between the property owners for shared parking and access should be provided ASAP	
3. Parking lot	Potential for conflicts between parishioners & residents	
4. Circulation	Potential for incorrect use of one-ways for convenience	
5. Headlight Glare / Fencing Plan	Headlight glare was an issue before, but may not be now that circulation pattern has been reversed – fence plan & details needed	
6. Landscaping & Lighting	Plans shall be provided – Applicant noted that some paved areas will be removed and planted, may be used for stormwater	
7. Retaining Wall	Should blend in with the neighborhood & not look industrial	
8. Windows	Mullions look like grates on rendering – no grates are allowed	
9. Renderings	Mullion issue, hand rails not shown, windows won't be blue	

10. Façade Improvements	Applicant should specify how façade will be improved – power washing, landscaping, and how the property will be maintained e.g., by a management company	
11. Universal Design	Very important considering demographic trends – the Applicant has indicated that all units will provide for this and one unit will be designated as handicapped accessible	
Conservation		
	Comment	Policy/Regulation
1. Jurisdiction	Site is outside of Conservation's jurisdiction	
2. Dumpster / Runoff	Parking lot sheet flow should be directed away from dumpster – Applicant indicated that dumpster will be elevated on concrete pad	
3. Trees	Should be native – Landscape Plan will be provided	
4. LID Measures	Low Impact Development stormwater measures recommended	
Building / Inspections		
	Comment	Policy/Regulation
1. Codes	Project will need to meet all building codes	
2. Handicap Access	Depending on cost of project, the front entrance on Woburn Street may need to be handicap accessible (rendering shows it is not)	
Fire		
	Comment	Policy/Regulation
1. Access	18 foot minimum drive aisle is required for fire truck access, plans do not reflect that. West side aisle may need to be widened / east side parallel parking may need to be eliminated to conform.	
2. Turning radius	Concern with truck maneuverability behind building	
3. Sprinklers	The building is over 7,500 SF and will be sprinklered	
4. Handicap access	HC access is at the rear, so EMS access to the rear is critical – elevator will be sized for stretcher	
Police		
	Comment	Policy/Regulation
1. Construction Hours	Must be followed	
Health		
	Comment	Policy/Regulation
1. Dumpsters	Permits needed for each dumpster; dumpsters need to be enclosed and latched; Health strongly advises against locating them inside	
2. Totes	Could have totes along the side or rear of the building if the management company is responsible for emptying them into the dumpster on a regular basis. This may promote recycling.	
DPW/Engineering		
	Comment	Policy/Regulation
1. I & I Fee	Project subject to an I&I fee, which is \$4 x twice the flow	
2. Handicap Parking	2 handicap spaces are required, 1 that is van accessible	
3. Signage	Provide signage plan for Woburn Street ingress/egress points and choke points in the parking lot	
4. Water & Sewer	Will most likely need to be upgraded	
5. Lighting	Lighting plan needed	

6. Snow Storage & Removal	Applicant would ideally store on grass, but may have to designate some parking spaces and/or contract with hauler	
7. Gas fired boiler	Will need to talk to gas company (National Grid) about possibility of extending high powered gas line from Summer Avenue	
8. Drainage	Issue at the rear of school lot has been mitigated, abutter would like it to remain that way with the new project	Email regarding call from abutter
RMLD		
	Comment	Policy/Regulation
1. Services / Meters	# of services and locations of meters need to specified	
2. Over or Under?	Determine this as well as size & conduits needed	
3. Additional Pole	May be needed	
4. Meter Room	Outdoor access to the meter room should be provided	
5. Easement	Needs to be secured	
6. Elevator	3 phase service is required for the elevator	
Town Manager		
	Comment	Policy/Regulation
1. Outreach	The Selectmen will want to know what has been done or will be done with regards to neighborhood outreach	
2. Joint Informational Meeting	The Selectmen may also be open to a joint meeting with the CPDC – there is a joint meeting scheduled on another 40B project on February 23 rd ; this could be added to that agenda.	